



MURIEL GOODE-TRUFANT
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

KATHLEEN M. LINNANE
Labor and Employment Law Division
Telephone: (212) 356-2467
Email: klinnane@law.nyc.gov

October 4, 2024

Via ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Trabacchi v. Department of Education of the City of New York, et al.
24-cv-06123 (TAM)

Dear Judge Merkl:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, assigned to represent defendant Department of Education of the City of New York (“DOE”) in the above-referenced action¹. I write to respectfully request a 60-day extension of time, from October 15, 2024, to December 14, 2024, for DOE to respond to the complaint. This is DOE’s first request for an extension of time to respond to the complaint, and the requested extension does not affect any scheduled dates. Pro se Plaintiff does not consent to the requested 60-day extension, stating that a “60-day extension is an excessive amount of time and this prejudices me because I have been harmed by financial hardship,” but seeks a 30-day extension of time to submit her own response, to which DOE does not object.

The complaint in this matter contains numerous allegations of discrimination against DOE and two individual defendants. Additional time is needed to collect and review documents in order to appropriately respond to the complaint, to assess representation of the individual defendants, and to speak with potential witnesses concerning the allegations.

We thank the Court for its consideration of this request.

Respectfully submitted,
/s/ Kathleen M. Linnane
Kathleen M. Linnane

Cc: Jadenae Trabacchi, *Pro Se* Plaintiff (By ECF, email, and USPS)

¹ The Office of the Corporation counsel does not yet represent the individual defendants, David Banks and Katherine Rodi. However, this request by DOE to extend the time to respond to the Complaint is also made on behalf of the individual defendants, Banks and Rodi.